

475 Park Avenue South- 26th Floor
New York, New York 10016
Tel: 212-983-1922 Fax: 877-254-1003
e-mail: grimlawyers@aol.com

W. M. Greenwald

June 28, 2019

Via ECF Filing,
and First Class Mail

Hon. Michael E. Wiles
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004

Re: ***Boaz Bagbag v. Summa Capital***
Adv No 19-01022 (MEW)

Dear Judge Wiles:

This firm represents Summa Capital Corp. ("Summa"), in this case.

I regret the need to bother Your Honor with the Debtor's latest effort to frustrate this case's progress.

Mr. Bagbag's deposition is scheduled for July 1, 2019. He is requiring Summa to provide him with a translator.

The request would be reasonable if was necessary. It is neither. Mr. Bagbag is fully fluent in English.

Annexed are copies of transcripts from Mr. Bagbag's depositions in 2008 and 2009. No difficulty of him understanding English is present. Also annexed is a docket sheet from an action which Mr. Bagbag commenced *pro se* in 2016.

Living in a country usually increases a person's fluency in that country's language. Mr. Bagbag apparently suggests that he is an exception to that norm. He is not. Mr. Bagbag regularly gives interviews in English.

Annexed are copies of published interviews of Mr. Bagbag, discussing his success. Nowhere does Mr. Bagbag describe his success despite his not being fluent in English.

Mr. Bagbag also was interviewed on videotape concern his efforts to improve taxi safety.

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The link for the program with that interview is: <https://www.industriesmostwanted.com/meet-boaz-bagbag-new-yorks-most-valuable-entrepreneur> and two articles containing interviews with Mr. Bagbag.<https://respect-mag.com/2019/06/respect-interview-boaz-bag-bag> , <https://www.thehypemagazine.com/2019/05/the-hype-magazine-interviews-boaz-bagbag>. He was conversant in English.

Apparently, Mr. Bagbag is making this demand to pose one more obstacle in this case proceeding and harass Summa with an unwarranted expense.

I emailed Mr. Pollock last evening with a suggested resolution. I received no response. Summa asks for a conference to resolve this issue.

Thank you for your consideration.

Respectfully,

/s/ Wayne M. Greenwald

Wayne M. Greenwald

WMG/ms
encls.
cc: Adam Pollock, Esq. *Via ECF and email*